

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : Case No. 1-20-02545-HWV
DAVID J. FOWBLE, SR., AKA :
DAVID FOWBLE, SR. AKA :
DAVID JAMES FOWBLE AND :
TAMMY L. FOWBLE, :
DEBTORS :
: Chapter 13

MOTION TO AMEND WAGE ATTACHMENT

AND NOW, this 28th day of December 2021, comes the Debtors, David J. Fowble, Sr., and Tammy L. Fowble, by and through their attorney, Strausbaugh Law, PLLC, respectfully represents:

1. Debtors filed a Chapter 13 Petition on August 27, 2020.
2. Debtors filed a Third Amended Chapter 13 Plan on December 28, 2021 to increase their plan payment to cure post-petition arrears.
3. Debtor, Tammy L. Fowble, receives regular income from employment with Reli Group, 5520 Research Park Dr #105, Baltimore, MD 21228 and should be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
4. Debtor, David J. Fowble, Sr., receives regular income from employment with Touch of Color, 5017 Jonestown Road, Harrisburg, PA 17112 and should be attached under 11 U.S.C. § 1326 to fund the Chapter 13 Plan.
5. The likelihood of success in this case will be much greater if Debtor's incomes are attached to fund the Plan.
6. Debtors consent to the wage attachment. A copy of this consent is attached hereto as Exhibit "A" and incorporated herein by reference.

WHEREFORE, Debtors respectfully request that this Honorable Court enter an Order

directing the above-mentioned employer to pay the Trustee in the amount set forth in the attached Order.

Respectfully submitted,

Dated: 12/28/2021

STRAUSBAUGH LAW, PLLC
By: /s/Scott J. Strausbaugh
Scott J. Strausbaugh, Esquire
Attorney for Debtors
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ORDER

Upon consideration of the above-named Debtors having filed a Petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS THEREFORE ORDERED that until further Order of this Court, the entity from whom the Debtor, David J. Fowble, Sr., receives income:

ATTN: PAYROLL DEPARTMENT
Touch of Color
5017 Jonestown Road
Harrisburg, PA 17112

deduct from said Debtor's income the sum of **\$213.35** from each bi-weekly paycheck, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor. Said sum is subject to periodic change as necessary. Said sum is to be sent to the Trustee until further notice of change from Debtor's counsel. Remit the deductible sums to:

Jack N. Zaharopoulos
Chapter 13 Trustee
P.O. Box 6008
Memphis, TN 38101-6008

IT IS FURTHER ORDERED that until further Order of this Court, the entity from whom the Debtor, Tammy L. Fowble, receives income:

ATTN: PAYROLL DEPARTMENT
Reli Group
5520 Research Park Dr #105,
Baltimore, MD 21228

deduct from said Debtor's income the sum of **\$231.12** from each paycheck on the 1st and 15th day of each month, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above Debtor. Said sum is subject to periodic change as necessary. Said sum is to be sent to the Trustee until further notice of change from Debtor's counsel.

Remit the deductible sums to:

Jack N. Zaharopoulos
Chapter 13 Trustee
P.O. Box 6008
Memphis, TN 38101-6008

IT IS FURTHER ORDERED that the employers from whom the Debtors receive income shall notify the Trustee if either Debtor's income is terminated and the reason therefore.

IT IS FURTHER ORDERED that all remaining income of the Debtors, except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to the Debtors in accordance with usual payment procedure.

IT IS FURTHER ORDERED that each employer will place the case number (found at the top of this Order) on all checks being forwarded to the Trustee to ensure proper accounting of the funds.

IT IS FURTHER ORDERED that this Order supersedes previous orders made to the subject entity in this case.

IT IS FURTHER ORDERED that this Order will terminate without further Order five (5) years from the date of this Order, if it is not terminated by an earlier Order from this Court or upon correspondence from Debtors' counsel or the Chapter 13 Trustee.

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DEBTORS' CONSENT TO VOLUNTARY WAGE ATTACHMENT

I, David J. Fowble, Sr., and Tammy L. Fowble, hereby consent to an Attachment of Wages for the purposes of funding our Chapter 13 case.

Date: 12/28/2021 /s/ David J. Fowble, Sr.
David J. Fowble, Sr.

Date: 12/28/2021 /s/ Tammy L. Fowble
Tammy L. Fowble